

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

Case No. 17-mc-151-LPS

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

**RED TREE INVESTMENTS, LLC’S MOTION FOR EXEMPTION FROM THE
STANDING ORDER REGARDING PERSONAL ELECTRONIC DEVICES**

Red Tree Investments, LLC (“Red Tree”) hereby respectfully moves for an order to exempt certain persons from the District of Delaware’s May 17, 2024, Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 17, 2024, Standing Order”). In support of the Motion, Red Tree states as follows:

1. The District of Delaware’s May 17, 2024, Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, inter alia, visitors to place personal electronic devices in a locked pouch provided by U.S. Marshals. Paragraph 4 of the Standing Order provides for certain exemptions to the Standing Order.

2. A Sale Hearing is scheduled for September 15 to September 18, 2025 (the “Hearing”) in Courtroom 6D in the above captioned action.

3. The following counsel, staff, and experts intend to appear at the Hearing on behalf of Red Tree and will require access to their electronic devices, which will help aid the hearing presentation, and communications during the presentation with those not in the courtroom:

- Steven F. Molo, counsel for Red Tree
- Justin M. Ellis, counsel for Red Tree
- Pratik K. Raj Ghosh, counsel for Red Tree
- Lauren F. Dayton, counsel for Red Tree
- James Breckenridge Heaton III, witness for Red Tree
- Gary Kleinrichert, witness for Red Tree
- Richard Hobbs, hot seat operator for Red Tree
- Daniel Scott, hot seat operator for Red Tree

4. The above-listed counsel for Red Tree do not meet the exemptions listed in Paragraph 4 of the May 17, 2024 Standing Order. All listed counsel are in good standing with at least one State bar in the United States and have been admitted *pro hac vice* in the associated matters pending before this Court: No. 22-mc-151 (LPS).

5. Red Tree respectfully requests that the Court issue an order, in the form attached hereto, to exempt the above persons from the District of Delaware's May 17, 2024, Standing Order.

Dated: September 10, 2025

LANDIS RATH & COBB LLP

Steven F. Molo (*pro hac vice*)
Justin M. Ellis (*pro hac vice*)
Lauren F. Dayton (*pro hac vice*)
Mark W. Kelley (*pro hac vice*)
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